

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
v.) Civil Action No. 2:21-cv-1145
)
\$12,261.00 IN UNITED STATES)
CURRENCY, 9mm CZ 75 B PISTOL, and)
ASSOCIATED MAGAZINES and)
AMMUNITION,)
)
Defendants.)

VERIFIED COMPLAINT FOR FORFEITURE

AND NOW comes the United States of America, by and through its counsel, Stephen R. Kaufman, Acting United States Attorney for the Western District of Pennsylvania, and David Lew, Assistant United States Attorney for the Western District of Pennsylvania, and respectfully represents as follows:

1. Plaintiff, the United States of America, brings this civil action *in rem* for forfeiture to the United States of \$12,261.00 in United States Currency, a 9mm CZ 75 B pistol bearing serial number B944053, and associated magazines and ammunition, further identified at asset ID numbers 21-FBI-005148 and 21-FBI-004489 (collectively the “Defendant Property”) pursuant to 21 U.S.C. §§ 881(a)(6) and 881(a)(11).

2. Jurisdiction is predicated upon 28 U.S.C. §§ 1345 and 1355. Venue is proper under 28 U.S.C. §§ 1395 and 1355.

3. On March 3, 2021, a federal search warrant was executed at the residence of Cecil Tartt (“Tartt”) located on Marion Avenue in Monessen, Pennsylvania.

4. During the execution of the warrant, law enforcement recovered approximately 35 grams of a compressed white powder from Tartt's residence. The powder was later tested and found to contain cocaine hydrochloride, a Schedule II controlled substance. Indicia of drug trafficking, including packaging materials, were also found in the residence.

5. Investigators also recovered a 9mm CZ 75 B pistol bearing serial number B944053, associated magazines and 9mm ammunition, and \$12,261.00 in U.S. currency (the "Defendant Property").

8. Following the search of residence, agents took custody of the Defendant Property.

9. The Federal Bureau of Investigation ("FBI") then instituted administrative forfeiture proceedings against the Defendant Property. During these proceedings, Tartt filed a claim for the Defendant Property. As a result, the United States has instituted this civil forfeiture action against the Defendant Property.

10. Based on the above facts, the Defendant Property is forfeitable to the United States pursuant to 21 U.S.C. §§ 881(a)(6) and 881(a)(11).

WHEREFORE, the United States of America respectfully requests that process of warrant *in rem* issue for the arrest of the Defendant Property; that judgment of forfeiture be entered in favor of the United States for the Defendant Property; and that the United States be granted such relief as this Honorable Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,

STEPHEN R. KAUFMAN
Acting United States Attorney

/s/ David Lew
DAVID LEW
Assistant U.S. Attorney
700 Grant Street, Suite 4000
Pittsburgh, PA 15219
412-894-7482 (tel)
412-644-2644 (fax)
david.lew@usdoj.gov
PA ID No. 320338 (AFF)

VERIFICATION

I am a Task Force Officer of the Federal Bureau of Investigation and an agent assigned the responsibility for this case. I have read the contents of the foregoing complaint for forfeiture and the statements contained therein are true and correct to the best of my knowledge and belief.

I verify under penalty of perjury that the foregoing is true and correct. Executed on this
30 day of August, 2021.



SHANE W. REAGHARD
Task Force Officer
Federal Bureau of Investigation